

## Burgess, Karen

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**Subject:** (documents attached) Columbia Generating Station Meeting with NFMS, Ecology, EFSEC  
**Location:** Room 2B-09, Ecology Building, Lacey, Washington

**Start:** Mon 8/11/2014 9:00 AM  
**End:** Mon 8/11/2014 11:00 AM  
**Show Time As:** Tentative

**Recurrence:** (none)

**Meeting Status:** Meeting organizer

**Organizer:** Burgess, Karen  
**Required Attendees:** Opalski, Dan; Palmer, John; Jim LaSpina (UTC) (JLaSpina@utc.wa.gov); McGowan, Vincent (ECY); Moore, Bill (ECY); 'Posner, Stephen (UTC)'; richard.domingue@noaa.gov; bryan.nordlund@noaa.gov; ritchie.graves@noaa.gov; mike.tehan@noaa.gov; Poulsom, Susan  
**Optional Attendees:** Lidgard, Michael

### Draft Agenda:

Overview of new permit conditions – Ecology

Feedback and discussion – NMFS

Next Steps toward Permit Issuance – EFSEC

EFSEC provided a cover letter and the revised draft CGS permit for the purpose of discussion. (Marked up version with all changes from public comment version.) Special condition S12. was added to address concerns expressed in our comment letter. I've also attached a copy our comment letter.

### *EFSEC Cover Letter*



20140724EPAInf...

### *Revised Draft Permit Language, refer to S12 or excerpted text below.*



20140714CGS\_N...

### *EPA Comment Letter on Draft*



Columbia  
Generating Stati...

The fact sheet will document EFSEC's intention to work with NMFS prior to approval of study plans. The following is an excerpt of new section added to address 316(b) requirements in the permit.

### **S12. Cooling water intake structure**

The Permittee must ensure that the cooling water intake structure (CWIS) is designed, operated, and maintained to minimize adverse environmental impact as follows.

## **S12.A. Operations and maintenance (O&M) manual**

The Permittee must, at all times, properly operate and maintain the CWIS including any technology used to minimize impingement and entrainment.

### **1. O&M manual submittal and requirements**

The Permittee must:

- a. Prepare an O&M Manual for the CWIS and submit it to EFSEC for approval by Insert Date (one year from effective date). The Permittee must submit a paper copy and an electronic copy (preferably in a portable document format (PDF)).
- b. Submit to EFSEC for review substantial changes or updates to the O&M Manual whenever it incorporates them into the manual. The Permittee must submit a paper copy and an electronic copy (preferably as a PDF).
- c. Keep the approved O&M Manual at the permitted facility.
- d. Follow the instructions and procedures of this manual.

### **2. O&M manual components**

The O&M manual must include:

- a. Procedures for evaluating impingement as required in S12.A.3.
- b. Procedures for evaluating entrainment as required in S12.A.4.
- c. Procedures for reporting any significant impingement or entrainment to EFSEC by telephone at 360-956-2121 within 24 hours.

### **3. Impingement evaluation**

The O&M manual must include procedures for evaluating impingement of any life stages of fish and shellfish on the outer surface of the intake structure, including where feasible:

- a. Visual or remote monitoring during times when the cooling water intake structure is operational, at least weekly.
  1. If conditions allow for a photographic verification, the Permittee must include such verification in the inspection.
- b. Document inspection dates, findings, and any maintenance performed.

### **4. Entrainment evaluation**

Following completion of the entrainment characterization study required in S12.B, the O&M manual must be revised to include procedures for on-going evaluation of entrainment of any life stages of fish and shellfish downstream of the outer surface of the intake structure, including where feasible:

- a. Visual or remote monitoring during times when the cooling water intake structure is operational, at least weekly.
  1. If conditions allow for a photographic verification, the Permittee must include such verification in the inspection.
- b. Document inspection dates, findings, and any maintenance performed.

## **S12.B. Entrainment Characterization Study**

The Permittee must prepare and conduct an entrainment characterization study consistent with the content requirements in 40 CFR 122.21(r) (9).

## 1. Study design

The Permittee must:

- a. Prepare documentation of the proposed entrainment characterization study design and submit it to EFSEC for approval by Insert Date (one year from effective date). The Permittee must submit a paper copy and an electronic copy (preferably in a portable document format (PDF)).

## 2. Study implementation

The Permittee must:

- a. Following EFSEC approval of the study design referenced in S12.B.1, conduct the entrainment characterization study according to the approved design.
- b. Submit the final entrainment characterization study to EFSEC by Insert Date (with the permit renewal application). The Permittee must submit a paper copy and an electronic copy (preferably in a portable document format (PDF)).

## 3. Engineering analysis

If the entrainment characterization study, or any other monitoring, indicates significant entrainment or impingement of federally-listed threatened and endangered species, the Permittee must:

- a. Prepare an engineering analysis, including costs and benefits associated with replacement of the intake structure consistent with approvable design criteria.
- b. Submit the final engineering analysis report to EFSEC by Insert Date (with the permit renewal application). The Permittee must submit a paper copy and an electronic copy (preferably in a portable document format (PDF)).

### S12.C. Closed-cycle recirculating system

The Permittee must continue to operate a closed-cycle recirculating system as defined at 40 CFR 125.92(c):

1. Monitor closed-cycle operation in accordance with S2.A (8).

### S12.D. Endangered Species Act

Nothing in this permit authorizes take for the purposes of a facility's compliance with the Endangered Species Act.

Please let me know if you have any questions.

KAREN BURGESS, P.E.  
NPDES Permits Unit - State Oversight Lead  
EPA Region 10

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U.S. Environmental Protection Agency  
Office of Water and Watersheds, M/S OWW-130  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101  
<http://www.epa.gov>





8/11/14

Richie

Jim Le Spina

Steve Posner

Bryan - AG office

Mike Tekon

Bin

Mike

Dan.

Dan -

Mike - Reorg. - area office Columbia basin office  
Hydro.

Forc. - Richie

Rich, Brian tech support group

316(b) Consultation. BiOp. on rule  
Lays out expected procedures.

Vince - Summary permit

Draft Spring of yr. 2014

RFC,

S12, New Section

rule finalized - rule doesn't apply until ~ mid-Oct.

Service, EPA, NRE, FWS, Columbia River  
NWEDC

Entrainment Chart -

Not required by rule  
but included.

Study Requirement  
B12.B.1

Approval design Criteria

HPA permit FWS

Use services manual

Info gathering -

Beyond required in current rule

Mike J - <sup>was</sup> Existing facility rule  
Statement director Use BPJ

Status - NRC Consultation

Informal NRC

Start NRC out of requesting consultation  
incident take - requires formal consideration.

Biological Study - ? list or unlisted fish.  
what fish type to provide take coverage.

No ~~EFN~~ under contract by EFSEC

Is NMFS will to review OTH & Study Plans

No change in position - on most effect to replace screen.

Bryan - not require entrainment, but option to  
go directly to screen replacement



May - in water work window  
high flow Columbia

NMFS - Comment on document  
take comment

EFSEC - Council ~~approve~~ weigh in.

Mike J - recommend.

Could eng. analysis be done concurrent  
w/ endorsement?

Evaluate cost - to make decision

Briefing -

2013 - May - June

Refueling -

40 day window.

next retnet reptime screens

Bill Moore - Status on process

NMFS  $\Rightarrow$  Give permittee option to skip study.

Steve - EFSEC

\* - Concerns for NMFS language to 12.

\* Changes to bring to Council.

\* Not to say Council wouldn't do more

NMFS - letter to council

Jim - Small permit first

Bill - EPA response equally important  
for letter

Dan - ~~Interp~~ Concept now.  
Bill - Off ramp No breeder \*

≥ Review study plans -

Permit say State proposal w/ NMFS  
for comments.

Jim - EFSEC Shares info. w/ Fed agencies.  
Comments back to EFSEC.

Dan - How to document intent.

Bill - Process happens in many permits

Vince ENW could work w/ NMFS

NMFS  
Brian > Permit Lang. to obligate ENW to  
do cost analysis concurrent